

1 FISHER & PHILLIPS LLP
2 SCOTT M. MAHONEY, ESQ.
3 Nevada Bar No. 1099
4 ANTHONY B. GOLDEN, ESQ.
5 Nevada Bar No. 9563
6 3800 Howard Hughes Parkway
7 Suite 950
Las Vegas, NV 89169
Telephone: (702) 252-3131
Facsimile: (702) 252-7411
E-Mail Address: agolden@laborlawyers.com

8 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IT IS HEREBY STIPULATED AND AGREED by and between the parties' counsel of record that the parties shall have an extension of time up to and including April 29, 2015 to file a Joint Pretrial Order. Defendant has prepared an initial draft of the Joint Pretrial Order but needs to coordinate discussions with Plaintiff regarding content and possible revisions.

Reasons why request was not submitted more than 21 days before deadline

Over the last month, counsel for Plaintiff has had seven depositions, two Early Neutral Evaluations, and was out of town on March 16, 17, 30, and 31 for pre-planned trips. Counsel for Defendant has been involved in protracted discovery matters in another pending matter, *Hirata et al. v. Southern Nevada Health District et al.*, 2:13-cv-

1 02302-LDG-VCF, which has in the last month included deposition preparation and
2 written discovery involving over 80,000 pages of documents, several hours of video
3 tape, and coordinating meet and confer sessions with opposing counsel in that case to
4 address outstanding discovery issues.
5

6 Despite best efforts, counsel in this case have been unable to coordinate
7 schedules to review documents and issues and finalize the Joint Pretrial Order. It
8 became apparent on April 3, 2015, when the parties first filed this stipulation, that
9 counsel was not going to be able to complete the Joint Pretrial Order by the current
10 deadline, counsel agreed to stipulate to extend the deadline to allow for the opportunity
11 to thoroughly discuss and complete the Joint Pretrial Order in this matter.
12

13 Dated this 6th day of April 2015.

Dated this 6th day of April 2015.

14 KEMP & KEMP

FISHER & PHILLIPS LLP

15 By: /s/ James P. Kemp, Esq.
16 7435 W. Azure Dr.
17 Suite 110
18 Las Vegas, Nevada 89130
Attorneys for Plaintiff

By: /s/ Anthony B. Golden, Esq.
3800 Howard Hughes Parkway
Suite 950
Las Vegas, Nevada 89169
Attorneys for Defendants

19 IT IS SO ORDERED:
20

21 
UNITED STATES MAGISTRATE JUDGE

22 Dated: April 7, 2015